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BEFORE THE
TENNESSEE REGULATORY AUTHORITY

CELLCO PARTNERSHIP,
d/b/a VERIZON WIRELESS
FOR ARBITRATION UNDER THE
TELECOMMUNICATIONS ACT

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Docket No. 03-00585

JOINT MOTION TO CONSOLIDATE PETITIONS FOR ARBITRATION

Cellco Partnership, doing business as Verizon Wireless ("Verizon Wireless"), on behalf of the CMRS providers referenced below, and the Tennessee Rural Independent Coalition ("ICOs")¹ hereby jointly and voluntarily move the Tennessee Regulatory Authority ("TRA") to consolidate the Petitions for Arbitration filed with the TRA on November 6, 2003 ("CMRS Petitions"). The CMRS Petitions for which Verizon Wireless and the ICOs seek consolidation hereafter are as follows: (a) Docket Number 03-00585, Verizon Wireless; (b) Docket Number 03-00586, Cingular Wireless; (c) Docket Number 03-00587, AT&T Wireless; (d) Docket Number 03-00588, T-Mobile; and (e) Docket Number 03-00589, Sprint PCS ("CMRS Petitioners"). As the "Statements of Support" attached hereto reflect, Verizon Wireless and the ICOs respectfully submit that this joint motion is supported by the preceding referenced parties.

¹ The Tennessee Rural Independent Coalition includes the following companies: Ardmore Telephone Company, Inc.; Ben Lomand Rural Telephone Cooperative, Inc.; Bledsoe Telephone Cooperative; CenturyTel of Adamsville, Inc.; CenturyTel of Claiborne, Inc.; CenturyTel of Ooltewah-Collegedale, Inc.; Concord Telephone Exchange, Inc.; Crockett Telephone Company, Inc.; Dekalb Telephone Cooperative, Inc.; Highland Telephone Cooperative, Inc.; Humphreys County Telephone Company; Loretto Telephone Company, Inc.; Millington Telephone Company; North Central Telephone Cooperative, Inc.; Peoples Telephone Company; Tellico Telephone Company, Inc.; Tennessee Telephone Company; Twin Lakes Telephone Cooperative Corporation; United Telephone Company; West Tennessee Telephone Company, Inc.; and Yorkville Telephone Cooperative.

BACKGROUND

For some time now, pursuant to developments in the TRA's Generic Docket Addressing Rural Universal Service (00-00523), the CMRS Petitioners and ICOs have actively engaged in negotiations for interconnection and reciprocal compensation arrangements. On May 5, 2003, the Prehearing Officer in 00-00523 issued an Order requiring *inter alia* that the CMRS providers be notified "of the opportunity to participate in **collective** negotiations with the [ICOs]."² On May 12, 2003, in accordance with the Order, the CMRS Petitioners were notified of their opportunity to participate in collective negotiations.³ Subsequent to receipt of such notification, on May 29, 2003, the CMRS Petitioners issued a *bona fide* request to begin interconnection negotiations with the ICOs pursuant section 252(b) of the Telecommunications Act of 1996 ("Act"). Since that time the CMRS Petitioners and the ICOs have met to negotiate reciprocal compensation and interconnections terms on several occasions. Negotiation sessions between the CMRS Petitioners and the ICOs occurred on June 2 & 3, July 16, August 4, September 18 & 30, and October 10, 2003, either through in-person, face-to-face negotiations or via teleconference. At all negotiation sessions, the ICOs were represented collectively as a coalition and the CMRS Petitioners participated jointly in hopes of negotiating one master template interconnection agreement. Although the CMRS Petitioners and the ICOs reserved their rights to step away from **collective** negotiations at any time, at no point during the negotiation sessions did any party elect to do so.

² *In Re: Generic Docket Addressing Rural Universal Service*, 00 Tenn. Reg. Auth. 00523, at p. 9 (May 5, 2003) (*emphasis added*).

³ Letter from Steve Kraskin, counsel for Tennessee Rural Independent Coalition, and Joelle Phillips, counsel for BellSouth Telecommunications to CMRS Providers (May 12, 2003) (on file with the Tenn. Reg. Auth., Docket No. 00-00523).

GROUND FOR GRANTING JOINT MOTION

1. Section 252 of the Act grants the TRA the express authority to consolidate proceedings “in order to reduce administrative burdens on telecommunications carriers.”⁴ Furthermore, during the entire negotiation process, the ICOs have been represented as a coalition, and the CMRS Petitioners have participated collectively. No new circumstances now change the nature of the parties ability to reach resolution collectively.

2. Consolidating the CMRS Petitions into one proceeding will dramatically preserve the TRA’s valuable resources in time and energy. The ultimate issues currently in dispute are extraordinarily similar for each individual ICO and have been articulated on behalf of the group through Steve Kraskin, counsel for the ICOs. However, exceptions to the general proposition of similarity can exist. For instance, issues of rates or points of interconnection could vary from ICO to ICO. The CMRS Providers and the ICOs appreciate that any party may have individualized issues and do not intend this joint motion to limit or waive any party’s rights to address such individual circumstances. Therefore, the CMRS Providers and the ICOs are prepared to work with the TRA to arrive at a satisfactory procedure to handle treatment of individual party issues should they arise during the course of the arbitration process. However, the potentiality of individual issues should not undermine the validity of attempting to judiciously and efficiently preserve resources by consolidating the CMRS Petitions into one proceeding.

3. As evidenced by the attachments hereto and the joint nature of this motion, the parties impacted by the arbitration proceedings support consolidation of the CMRS Petitions into

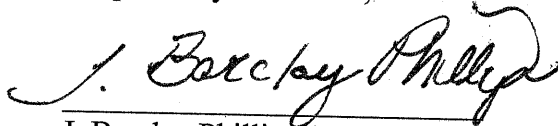
⁴ See 47 U.S.C. 252(g). The Act allows a State commission to consolidate proceedings under Section 252 “in order to reduce administrative burdens on telecommunications carriers, other parties to the proceedings, and the State commission.” This should be particularly true when the parties agree to pursue consolidated arbitration proceedings.

one proceeding. Verizon Wireless and the ICOs respectfully request that the TRA consider these "Statements of Support" as supplementary grounds for granting the joint motion to consolidate.

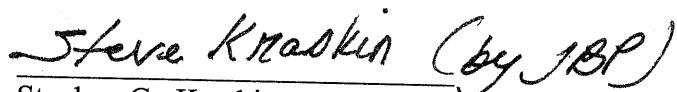
CONCLUSION

Pursuant to the foregoing, Verizon Wireless and the ICOs respectfully request that the TRA grant their joint motion to consolidate the CMRS Petitions herein referenced into one proceeding. Affirmatively granting this joint motion is supported by sound precedent of the ongoing negotiation process between the parties, preserves valuable resources of the State of Tennessee, and comports to the desires of the parties involved.

Respectfully submitted,



J. Barclay Phillips, BPR #20241
Miller & Martin, LLP
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150 Fourth Avenue North
Nashville, TN 37219-2433
(615) 244-9270



Stephen G., Kraskin
On behalf of the Tennessee Rural
Independent Coalition
2120 L. Street, N.W.
Suite 520
Washington, D.C. 20037

JBP

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d/b/a VERIZON WIRELESS
FOR ARBITRATION UNDER THE
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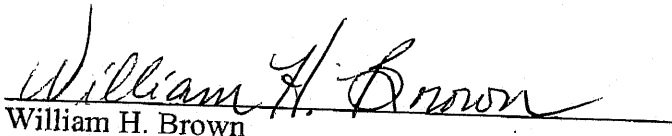
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Docket No. 03-00585

**STATEMENT OF SUPPORT FOR THE JOINT MOTION TO CONSOLIDATE
PETITIONS FOR ARBITRATION BY BELL SOUTH MOBILITY LLC;
BELL SOUTH PERSONAL COMMUNICATIONS, LLC; CHATTANOOGA
MSA LIMITED PARTNERSHIP; COLLECTIVELY d/b/a CINGULAR WIRELESS**

I, William H. Brown, on behalf of BellSouth Mobility LLC; BellSouth Personal Communications, LLC; and Chattanooga MSA Limited Partnership; collectively d/b/a Cingular Wireless, CMRS Petitioner in Docket Number 0300586, hereby state such CMRS Petitioner's support for the Joint Motion to Consolidate Petitions For Arbitration ("Motion") filed in the above-captioned proceeding. The consolidation sought by the Motion is consistent with the manner in which the ICOs and CMRS Petitioners have engaged in collective interconnection negotiations for the past several months. Furthermore, granting the Motion will help preserve the Tennessee Regulatory Authority's resources and prevent unnecessary duplication within arbitration proceedings given the substantial similarities between each party's issues.

Respectfully submitted,


William H. Brown

Senior Interconnection Manager
BellSouth Mobility LLC; BellSouth Personal
Communications, LLC; Chattanooga MSA Limited
Partnership; collectively d/b/a Cingular Wireless

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Docket No. 03-00585

**STATEMENT OF SUPPORT
FOR
THE JOINT MOTION TO CONSOLIDATE PETITIONS
FOR ARBITRATION
BY AT&T WIRELESS PCS, LLC d/b/a/ AT&T WIRELESS**

I, Beth Fujimoto, on behalf of AT&T Wireless PCS, LLC d/b/a AT&T Wireless, CMRS Petitioner in Docket Number 03-00588, hereby state such CMRS Petitioner's support for the Joint Motion to Consolidate Petitions For Arbitration ("Motion") filed in the above-captioned proceeding. The consolidation sought by the Motion is consistent with the manner in which the ICOs and CMRS Petitioners have engaged in collective interconnection negotiations for the past several months. Furthermore, granting the Motion will help preserve the Tennessee Regulatory Authority's resources and prevent unnecessary duplication within arbitration proceedings given the substantial similarities between each party's issues.

Respectfully submitted,



Beth Fujimoto
Regulatory Counsel, Legal & External Affairs
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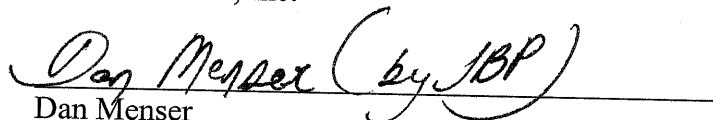
Docket No. 03-00585

**STATEMENT OF SUPPORT
FOR
THE JOINT MOTION TO CONSOLIDATE PETITIONS
FOR ARBITRATION
BY T-MOBILE USA, INC.**

I, Dan Menser, on behalf of T-Mobile USA, Inc. ("T-Mobile"), CMRS Petitioner in Docket Number 03-00588, hereby state such CMRS Petitioner's support for the Joint Motion to Consolidate Petitions For Arbitration ("Motion") filed in the above-captioned proceeding. The consolidation sought by the Motion is consistent with the manner in which the ICOs and CMRS Petitioners have engaged in collective interconnection negotiations for the past several months. Furthermore, granting the Motion will help preserve the Tennessee Regulatory Authority's resources and prevent unnecessary duplication within arbitration proceedings given the substantial similarities between each party's issues.

Respectfully submitted,

T-Mobile USA, Inc.

 (by IBP)

Dan Menser
Marin Fettman
Corporate Counsel
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
(425) 378-4000

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TENNESSEE REGULATORY AUTHORITY

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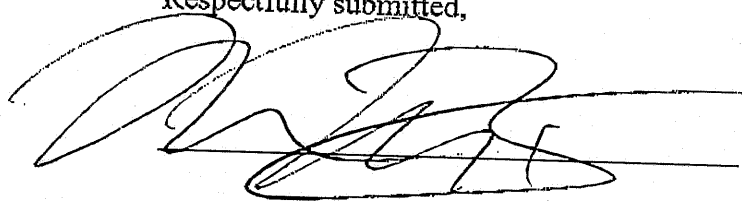
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Docket No. 03-00585

STATEMENT OF SUPPORT
FOR
THE JOINT MOTION TO CONSOLIDATE PETITIONS
FOR ARBITRATION
BY SPRINT SPECTRUM D/B/A SPRINT PCS

I, Monica M. Barone, on behalf of Sprint Spectrum d/b/a Sprint PCS, CMRS Petitioner in Docket Number 03-00589, hereby state such CMRS Petitioner's support for the Joint Motion to Consolidate Petitions for Arbitration ("Motion") filed in the above-captioned proceeding. The consolidation sought by the Motion is consistent with the manner in which the ICOs and CMRS Petitioners have engaged in collective interconnection negotiations for the past several months. Furthermore, granting the Motion will help preserve the Tennessee Regulatory Authority's resources and prevent unnecessary duplication within arbitration proceedings given the substantial similarities between each party's issues.

Respectfully submitted,



CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2003, a true and correct copy of the foregoing has been served on the parties of record, via the method indicated:

<input type="checkbox"/> Hand <input type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	J. Barclay Phillips, Esquire Miller & Martin LLP 1200 One Nashville Place 150 Fourth Avenue North Nashville, Tennessee 37219
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Elaine Critides Verizon Wireless 1300 I. Street, N.W. Suite 400 West Washington, D.C. 20005
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Stephen G. Kraskin, Esquire Kraskin, Lesse & Cosson, LLP 2120 L Street NW, Suite 520 Washington, DC 20037
<input checked="" type="checkbox"/> Hand <input type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	J. Gray Sasser, Esquire Miller & Martin LLP 1200 One Nashville Place 150 Fourth Avenue North Nashville, Tennessee 37219
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Paul Walters, Jr. 15 East 1 st Street Edmond, OK 73034
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Mark J. Ashby Cingular Wireless 5565 Glennridge Connector Suite 1700 Atlanta, GA 30342

<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Suzanne Toller, Esquire Davis Wright Tremaine LLP One Embarcadero Center, #600 San Francisco, CA 94111-3611
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Beth K. Fujimoto, Esquire AT&T Wireless Services, Inc. 7277 164 th Ave., NE Redmond, WA 90852
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	James B. Wright Sprint 14111 Capital Boulevard Wake Forest, NC 27587
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Monica M. Barone Sprint PCS 6450 Sprint Parkway, MailStop 2A459 Overland Park, KS 66251
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Tom Sams Cleartalk 1600 Ute Avenue Grand Junction, CO 81501
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Dan Menser Sr. Corporate Counsel T-Mobile USA, Inc. 12920 SE 38 th Street Bellevue, WA 98006
<input type="checkbox"/> Hand <input checked="" type="checkbox"/> Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight	Marin Fettman Corporate Counsel, Regulatory Affairs T-Mobile USA, Inc. 12920 SE 38 th Street Bellevue, WA 98006

J. Barclay Phillips
(Name)